

EXHIBIT 4



Jodi L. Weaver
Trademark Paralegal On Assignment To
Toyota Motor Sales, U.S.A., Inc.
jodi.weaver@toyota.com

Toyota Motor Sales, U.S.A., Inc.

255 East Fifth Street, Suite 1900
Cincinnati, OH 45202
(513) 977-8445 Phone

October 21, 2016

VIA UPS SECOND DAY

Mr. Scott Anderson
175 SW 7th St. Suite 1911
Miami, Florida, 33130

Re: Toyota's Trademark(s): Toyota Word Mark
Your Use: Toyota use in Domain and Website Name, Toyota and Scion Logos on
Website
Domain Name ToyotaPartsEstore.com
Our File: TME- 3425-16

Dear Mr. Anderson:

We write in follow up to our letter of March 18, 2016, a copy of which is attached, and numerous telephone discussions in August 2016. A review of the domain ToyotaPartsEstore.com reveals your company to be still actively using the Toyota trademark as part of this domain.

Only Toyota companies and authorized dealers may use Toyota's Trademarks in logo form, a part of a business name, or in any other manner as a trademark. While independent businesses such as repair facilities, used car businesses, or parts businesses may generally use Toyota's Trademark in plain text in advertising materials to truthfully identify genuine used Toyota products, services for Toyota vehicles, or parts that fit Toyota vehicles, federal and state laws prohibit use of Toyota's Trademarks in logo form or in word form in a manner that is likely to confuse consumers or dilute Toyota's trademark rights, including any such use in a business name or domain name. Toyota's Trademarks are famous and entitled to a broad scope of protection, including protection against uses outside of the automotive field.

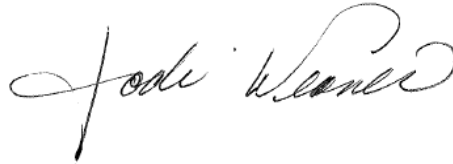
We therefore repeat our request that you cease any further infringement of Toyota's trademarks as set forth in our correspondence.

Please contact me upon receipt of this letter to discuss a plan for correcting your uses of Toyota's Trademark. We prefer to resolve this matter amicably and therefore would appreciate a response upon receipt of this letter. I can be reached at (513) 977-8445

TOYOTA

May 6, 2016
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Jodi L. Weaver". The signature is fluid and cursive, with the first name "Jodi" being more prominent and the last name "Weaver" following in a similar style.

Jodi L. Weaver
Trademark Paralegal on Assignment to
Toyota Motor Sales, U.S.A., Inc.



Jodi L. Weaver
Trademark Paralegal On Assignment To
Toyota Motor Sales, U.S.A., Inc.
jodi.weaver@toyota.com

Toyota Motor Sales, U.S.A., Inc.

255 East Fifth Street, Suite 1900
Cincinnati, OH 45202
(513) 977-8445 Phone

January 6, 2017

VIA UPS SECOND DAY

Mr. Scott Anderson
175 SW 7th St. Suite 1911
Miami, Florida, 33130

Re: Toyota's Trademark(s): Toyota Word Mark
Your Use: Toyota use in Domain and Website Name
Domain Name ToyotaPartsEstore.com
Our File: TME- 3425-16

Dear Mr. Anderson:

We write in follow up to our letter of March 18, 2016, a copy of which is attached, and numerous telephone discussions in August 2016. Thank you for removing the Toyota and Scion Logos from the ToyotaPartsEstore.com website. Unfortunately, we note that your domain ToyotaPartsEstore.com is actively using the Toyota trademark as part of the domain itself.

Only Toyota companies and authorized dealers may use Toyota's Trademarks in logo form, a part of a business name, or in any other manner as a trademark. While independent businesses such as repair facilities, used car businesses, or parts businesses may generally use Toyota's Trademark in plain text in advertising materials to truthfully identify genuine used Toyota products, services for Toyota vehicles, or parts that fit Toyota vehicles, federal and state laws prohibit use of Toyota's Trademarks in logo form or in word form in a manner that is likely to confuse consumers or dilute Toyota's trademark rights, including any such use in a business name or domain name. Toyota's Trademarks are famous and entitled to a broad scope of protection, including protection against uses outside of the automotive field.

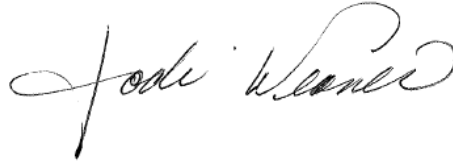
We therefore repeat our request that you cease any further infringement of Toyota's Trademarks as set forth in our correspondence. We request, in order to avoid any violation of our rights, that you change your name to a name which does not use Toyota's Trademarks, or recognizable portions of them.

Please contact me upon receipt of this letter to discuss a plan for correcting your uses of Toyota's Trademark. We prefer to resolve this matter amicably and therefore would appreciate a response upon receipt of this letter. I can be reached at (513) 977-8445

TOYOTA

January 6, 2017
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Jodi L. Weaver". The signature is written in a cursive, flowing style with a large initial "J" and a long, sweeping underline.

Jodi L. Weaver
Trademark Paralegal on Assignment to
Toyota Motor Sales, U.S.A., Inc.

Legal Counsel.

Dinsmore

DINSMORE & SHOHL LLP
255 East Fifth Street • Suite 1900 • Cincinnati, OH 45202
www.dinsmore.com

April L. Besl
513.977.8547 direct/513.977.8141 fax
april.besl@dinsmore.com

February 26, 2018

VIA CERTIFIED MAIL and
EMAIL: modmovite@gmail.com

Mr. Scott Anderson
175 SW 7th T. Suite 1911
Miami, FL 33130

RE: Infringement of Toyota Trademarks

Dear Mr. Anderson,

This law firm is counsel to Toyota Motor Sales, U.S.A. Inc. ("**Toyota**") on its intellectual property and enforcement matters. We write in follow-up to numerous letters and emails sent to you and your business at Toyota Parts EStore ("**EStore**") by Toyota regarding your use of the TOYOTA word mark in your website domain name www.toyotapartsestore.com ("**Domain**"), the prominent use of the TOYOTA Logo in red, and use of the term "Toyota genuine" to describe your products. See screenshot attached hereto.

As you are well aware, Toyota is the owner of all right, title, and interest in the famous TOYOTA trademark. Toyota, through its parent company, is also the owner of numerous trademark registrations with the US Trademark Office for the LEXUS mark, including but not limited to, U.S. Reg. Nos. 0843138, 1,338,339, 1,589,552, 1,274,261, 1,698,252, and 1,721,365. Toyota is also the owner of all common law rights in the TOYOTA trademark (collectively all rights in the TOYOTA trademark, including all registrations, are referred to as the "**TOYOTA Mark**").

EStore has been provided with ample notice of Toyota's senior rights in and to the TOYOTA Mark through extensive correspondence with Ms. Weaver of Toyota, including telephone calls. Indeed, EStore represented to Ms. Weaver that it was reviewing Toyota's concerns with its counsel; however, no further response has been received to date. Further, EStore has brazenly, openly, and willfully continued its use of the TOYOTA Mark at the Domain, including prominently displaying the TOYOTA Mark in its famous red font, in full knowledge of Toyota's senior rights and the potential for confusion and harm.

Moreover, EStore brazenly continues to refer to its products as "Toyota genuine," despite repeated notice that such usage is not permitted as only authorized dealers and Toyota companies are authorized to make such claims.

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Such actions are a clear violation of the Lanham Act and the Federal Trademark Dilution Act of 1995. Specifically, 15 U.S.C. § 1125(a)(1)(A) prohibits “any person...on or in connection with any goods or services, or any container for goods, [from] us[ing] in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin . . . which is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval or his or her goods, services, or commercial activities by another person.” Additionally, 15 U.S.C. § 1125(c) prohibits “any person who . . . commences use of a mark or trade name in commerce that is likely to cause dilution by blurring or dilution by tarnishment of [a] famous mark, **regardless of the presence or absence of actual or likely confusion, of competition, or of actual economic injury.**” See 15 U.S.C. § 1125(c) (emphasis added). Dilution by blurring results where the “association arising from the similarity between a mark or trade name and a famous mark . . . impairs the distinctiveness of the famous mark.” *Id.*

EStore’s use of the TOYOTA Mark as described herein and set forth by Ms. Weaver implies, at a minimum, that Toyota is affiliated with and/or has sponsored or otherwise approved the goods sold by your business. Such a belief is further compounded and heightened by the false claim by EStore that its products are “Toyota genuine” as seen on the attached screenshot.

Additionally, there is no question that the TOYOTA Mark has achieved a significant level of fame and recognition throughout the country and therefore can claim the benefit of the protection of the Lanham Act and Federal Trademark Dilution Act. The use of the TOYOTA Mark by toyotapartsestore.com at the Domain is a blurring of Toyota’s famous TOYOTA Mark and weakens the connection in consumers’ minds between TOYOTA and Toyota’s goods and services. Further, the use of the term “genuine” implies a connection between your goods and those offered by Toyota that will likely confuse customers thereby further weakening the connection.

Toyota vigorously defends its trademark rights in the TOYOTA Mark and has made every effort to amicably resolve this matter with your organization. However, Toyota cannot allow the continued infringement and dilution of its famous TOYOTA Mark to continue without action. Toyota has expended valuable resources, time and money in creating and maintaining the goodwill and fame of its TOYOTA Mark and is dedicated to preventing their parties from damaging or diluting this goodwill through unauthorized usage of the mark.

Accordingly, we demand that toyotapartsestore.com immediately cease and forever desist any and all use of the TOYOTA Mark, including but not limited to the Domain.

This letter is written without prejudice to Toyota’s rights. We must have your response no later than **seven business days from the date of this letter.** If we do not

February 26, 2018
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hear from you by this date, Toyota may elect, without further notice to you, to enforce its rights regarding this infringement.

We look forward to your prompt response.

Sincerely,



April L. Besl

Enclosure

cc: Ms. Jodi Weaver (jodi.weaver@toyota.com)

Wells, Kristi

From: Wells, Kristi on behalf of Besl, April L.
Sent: Monday, February 26, 2018 2:35 PM
To: 'modmovite@gmail.com'
Cc: 'jodi.weaver@toyota.com'
Subject: Infringement of Toyota Trademarks
Attachments: Scott Anderson Letter.pdf

Dear Mr. Anderson,

Please see the attached. Thank you.

Sincerely,

Dinsmôre

April L. Besl
Attorney

Dinsmore & Shohl LLP • Legal Counsel
255 East Fifth Street
Suite 1900
Cincinnati, OH 45202
T (513) 977-8527 • F (513) 977-8141
E april.besl@dinsmore.com • dinsmore.com



Legal Counsel.

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April L. Besl
513.977.8527 direct/513.977.8141 fax
april.besl@dinsmore.com

June 29, 2018

VIA CERTIFIED MAIL and
EMAIL: modmovite@gmail.com

Mr. Scott Anderson
175 SW 7th T. Suite 1911
Miami, FL 33130

RE: Infringement of Toyota Trademarks

Dear Mr. Anderson,

We write in follow-up to our February 26, 2018 letter regarding Toyota Parts EStore's ("EStore") unauthorized use of the TOYOTA word mark in your website domain name www.toyotapartsestore.com ("Domain"), the prominent use of the TOYOTA Logo in red, and use of the term "Toyota genuine" to describe your products. To date we have had no response from EStore and note that the Domain and all use of the Toyota marks remain active.

We once again demand that EStore immediately cease and forever desist any and all use of the TOYOTA Mark, including but not limited to the Domain and all uses described herein.

This letter is written without prejudice to Toyota's rights. We must have your response no later than seven business days from the date of this letter. If we do not hear from you by this date, Toyota may elect, without further notice to you, to enforce its rights regarding this infringement.

We look forward to your prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "April L. Besl".

April L. Besl

ALB:jw
Enclosure
13056543v2

Wells, Kristi

From: Wells, Kristi on behalf of Besl, April L.
Sent: Friday, June 29, 2018 12:27 PM
To: 'modmovite@gmail.com'
Subject: Infringement of Toyota Trademarks
Attachments: Anderson Letter.pdf

Dear Mr. Anderson:

Please see the attached. Thank you.

Sincerely,

The logo for Dinsmore, featuring the word "Dinsmore" in a serif font with a small accent mark over the 'i'.

April L. Besl
Partner

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